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5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 FEDERAL TRADE COMMISSION,

9 Plaintiff,

v.

10 AMAZON.COM, INC., *et al.*,

11 Defendants.

12 No. 2:23-cv-0932-JHC

13 **STIPULATION AND ORDER
14 REGARDING CROSS-MOTIONS
15 FOR PROTECTIVE ORDER**

16 STIPULATED MOTION

17 The parties, by and through their attorneys of record, respectfully request that the Court
18 enter the proposed Order set forth below, which permits a party resisting a motion to compel
19 discovery to do so without any requirement that it file a separate cross-motion for a protective
20 order.

21 In support of this request, the parties represent the following to the Court:

22 1. The parties are in ongoing negotiations regarding discovery issues.

23 2. The parties agree that if, despite their best efforts, judicial intervention is needed
24 to resolve their disputes, they would like to make the process as efficient as possible for the
25 Court and parties.

26 3. To further this goal, the parties agree that a party resisting a motion to compel
27 discovery may, at the party's election, oppose the motion to compel in an opposition brief
without the need to file a cross-motion for a protective order.

28 4. Accordingly, the parties stipulate as follows and jointly request that the Court
29 enter the following order approving that stipulation:

- 1 a. A cross-motion for a protective order will not be required from any party to
- 2 fully resist a motion to compel without waiving any rights or privileges.
- 3 b. Any party at its election may also affirmatively move or cross-move for a
- 4 protective order pursuant to LCR 7(k) should it choose to do so.

5 Stipulated to and respectfully submitted this 24th day of January, 2024, by:

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20 ORDER

21 Based on the foregoing, IT IS SO ORDERED.

22 DATED this 25th day of January, 2024.

23 
24 JOHN H. CHUN
25 UNITED STATES DISTRICT JUDGE